

CRIMINAL COMPLAINT  
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Dawn Elizabeth Anderson; DOB: 1975; United States	<b>22-08712MJ</b>
MAGISTRATE'S CASE NO.	
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).	

**COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:**

On or about July 27, 2022, in the District of Arizona, **Dawn Elizabeth Anderson**, knowing or in reckless disregard that certain aliens, including Rafael Rubio-Rubio, had come to, entered, and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i)**.

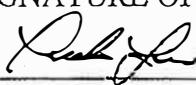
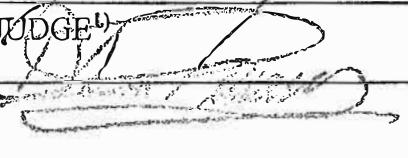
**BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:**

On or about July 27, 200, in the District of Arizona (Patagonia), a Santa Cruz County Sheriff Office (SCCSO) deputy conducted a vehicle stop on a 2020 Ford Explorer for expired tags. The deputy suspected the driver, Dawn Elizabeth Anderson of alien smuggling and contacted United States Border Patrol Agents (BPA) to assist. A BPA arrived and conducted an immigration inspection of the three passengers dressed in camouflage. The passengers including Rafael Rubio-Rubio were determined to be Mexican citizens illegally present in the United States.

Records checks revealed that Rafael Rubio-Rubio did not have the proper immigration documentation to enter or remain in the U.S. legally. Material witness Rafael Rubio-Rubio said he had arranged to be smuggled into the United States for money. Rubio said that he crossed the International Boundary Fence with a group and walked approximately five hours before being picked up by a vehicle.

In a post-*Miranda* statement, **Anderson** stated that she needed money. **Anderson** said she reached out to a friend who introduced her to a man who offered to help her make money several ways. **Anderson** said she chose to smuggle aliens to Phoenix, Arizona because it will pay more money. **Anderson** said she rented a vehicle and received instructions through WhatsApp including a pin location to a load up spot. At the location, it was very dark and three people opened the door to her rental vehicle and got in. **Anderson** said she was going to be paid \$1,000 per person she picked up.

**MATERIAL WITNESSES IN RELATION TO THE CHARGE:** Rafael Rubio-Rubio

Detention Requested	SIGNATURE OF COMPLAINANT 
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	OFFICIAL TITLE Border Patrol Agent
AUTHORIZED BY: AUSA HNS/lh 	
Sworn by telephone <input checked="" type="checkbox"/>	
SIGNATURE OF MAGISTRATE JUDGE 	DATE July 28, 2022